



ROCK ISLAND COUNTY
REPUBLICAN CENTRAL COMMITTEE

Tom Getz, *Chairman*

1721 5th Ave., Ste. 100
Moline, Illinois 61265
Phone: 309/764-6262
Fax: 309/764-5818

September 18, 2000

Office of General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL
SEP 25 3 13 PM '00

RE: MUR 5031

Dear General Counsel:

With the General Election just seven weeks away, I am growing increasingly concerned that the illegal activities outlined in our complaint (MUR 5031) will be repeated this fall and nothing will prohibit the involved parties from, again, unfairly influencing the outcome of the 17th District Congressional race. This is why I am writing to you requesting the Federal Election Commission to make an expedited decision regarding this matter.

I have enclosed additional information to support my suspicions that the illegal activities contained in our complaint will be repeated this fall.

Additionally, please note that our address has changed to 1721 5th Ave., Ste 100, Moline, Illinois 61265.

Sincerely,

Tom Getz
Chairman

Signed and sworn to before me, on September 18, 2000

(SEAL):



Notary Public

COMPLAINANT: Rock Island County Republican Central Committee
1721 5th Ave., Ste. 100
Moline, IL 61265

RESPONDENTS: Friends of Lane Evans
P O Box 5263
1800 3rd Avenue
Rock Island, IL 61204

Lane Evans
Congressman, 17th District, IL
P O Box 5263
1800 3rd Avenue
Rock Island, IL 61204

Samuel M. Gilman
Treasurer, Friends of Lane Evans Committee
P.O. Box 5263
1800 3rd Avenue
Rock Island, IL 61204

Eric Nelson
Assistant Treasurer, Friends of Lane Evans Committee
2028 7th Avenue
Apt. 2B
Moline, IL 61265

Democratic Party of Illinois
P O. Box 518
Springfield, Illinois 62705

Michael J. Madigan,
Chairman, Democratic Party of Illinois
P.O. Box 518
Springfield, Illinois 62705

Michael J Kasper
Treasurer, Democratic Party of Illinois
P.O Box 518
Springfield, Illinois 62705

Rock Island Democratic Central Committee
P O Box 3128
1800 3rd Avenue
Rock Island, IL 61204

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John Gianulis
Chairman, Rock Island Democratic Central Committee
Chairman, 17th District Victory Fund
9226 78th Avenue, West
Andalusia, IL 61232

Walter J Tiller
Treasurer, Rock Island Democratic Central Committee
2821 - 7 1/2 Street
E. Moline, IL 61244

17th District Victory Fund
P.O. Box 4482
Rock Island, IL 61204

Connie Engholm
Treasurer, 17th District Victory Fund
2514 N. Campbell #3
Chicago, IL 60647

Knox County Democratic Central Committee
869 Beecher Avenue
Galesburg, IL 61401

Janet K. Hill
Chairman, Knox County Democratic Central Committee
1072 Grand Avenue
Galesburg, IL 61401

Jeremy S. Karlin
Treasurer, Knox County Democratic Central Committee
869 Beecher Avenue
Galesburg, IL 61401

(Please note that while there are many people, particularly Democrat elected officials, specifically named on the attached printed material, we, the Rock Island County Republican Central Committee, do not believe, at this time, that these individuals were active participants in the following violations of FEC law. Therefore, we purposely didn't include them in the complaint. However, should evidence surface that implicates these individuals as being involved in the mentioned activities and violations, we would like to reserve the right to amend this complaint to include them as respondents.)

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Supplemental Information to Complaint (MUR 5031)

Potential failure to report in-kind contributions

According to FEC law, an individual may volunteer uncompensated personal services to a party committee without making a contribution 10017 (b) (3) Volunteer activity is not reportable Note, however, that if volunteers are in fact paid for their services by someone other than the party committee, the activity is no longer considered volunteering, and the payments result in in-kind contributions to the party committee 100 7 (a) (3)

While volunteering, an individual may pay for normal subsistence expenses (lodging and meals) without making a contribution 100 7 (b) (8)

The 17th District Victory Fund has paid Strategic Consulting Group who will pay for the services and living expenses of 15 people who will work for the committee. Therefore, their activities are not considered volunteer activities and should be reported. Based on information and belief, these services will not be reported as in-kind contributions

- According to an article in the Moline Dispatch, 15 people from all over the country will be coming into the 17th District to work for the 17th District Victory Fund (See Appendix 15).
- According to their July 2000 Quarterly FEC report, the 17th District Victory Fund has paid \$22,500 to Strategic Consulting Group Based on information and belief, this is partial payment to Strategic Consulting Group for living expenses and salaries of these 15 workers (Appendix 16).

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Appendix 15

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From the pages of
The Dispatch/Argus

News summary

Classified Ads

Q-C Weather

Home Page

July 10, 2000 12:33 AM

Democrats back with outside help

By Bethany Behrhorst, Dispatch/Argus Staff writer

Democrats will get help from friends outside the 17th Congressional District again this election cycle, something that upsets some Republican leaders.

Volunteers from around the country first came to the district in 1998 to bolster support for Democratic candidates on ballots in the 14-county area

The volunteers, part of a national "campaign school," are given extensive training, then sent to work for Democrats in congressional districts anticipating tough races

"They're a bunch of good Democrats," said Genie Dunn, a Nashville, Tenn., native who recently was in the Quad-Cities.

Ms. Dunn, 25, field director for the 17th Congressional District campaign school, has been active in politics since 1994 and works for Chicago-based Strategic Consulting Group, which sets up the schools across the country.

"The 12- and 16-hour days I put in seem like regular eight- or nine-hour days," she said. "I love the work."

Republican leaders say the school is just a Democratic tool to get votes for 17th District Democratic incumbent Lane Evans of Rock Island, who is facing GOP challenger Mark Baker of Quincy for the third time.

Rock Island County Democratic Party chairman John Gianulis said that, in 1998, student volunteers knocked on doors, canvassed, and rallied "grassroots support" for federal, state and county Democratic candidates, including Mr. Evans.

They will do it again this time, he said

The campaign school expects about 15 college-age-and-older adults, all from other parts of the country, Ms. Dunn said. Volunteers are selected because of their interest in politics and can decide on which campaign to work

"We have one man from California who decided he wanted to come to the 17th District because he served in the Marine Corps," Ms. Dunn said. "And one woman lost her husband to complications caused by Agent Orange exposure

"These people know that Congressman Evans has fought for veterans' rights and the rights of seniors, as well as to preserve the environment, and that's why they want to offer their support," she said

Volunteers will stay in the homes of district Democrats. Mileage reimbursement, and \$100 a week for food and whatever else they might need, is all they receive from the 17th District Victory Fund, Ms. Dunn said

"If they have car payments and other bills, they have to come up with some

way to pay them during the four months they'll work on the campaign," she said

The 17th District Victory Fund is a local Democratic Party committee with the aim of promoting Democratic candidates throughout Western Illinois.

Ms. Dunn, who has degrees in political science and journalism from Western Kentucky University, said she enjoys helping volunteers learn more about the political process.

Mr. Gianulis praised the volunteers' work. "They're very much involved in our everyday activities."

The group's focus this time will be "at the top of the ticket," Mr. Gianulis said. Because it's a presidential election year, he said, he's optimistic more voters will turn out at the polls.

"We know these volunteers will have a great impact on the turnout of the election," he said. "They'll be very much part of the campaign."

Rock Island County Republican leaders filed a Federal Election Commission complaint last month against Mr. Evans and four Democratic committees, including the 17th District Victory Fund. The complaint alleges the Victory Fund should be counted as an in-kind contribution to Mr. Evans' re-election campaign.

A Republican Party statement, released separately from the complaint, accused Mr. Gianulis, 17th District Victory Fund treasurer Connie Engholm, and other Democratic leaders of having a conflict of interest because they are involved in more than one Democratic party-building group, some of which they say have direct ties to the Evans campaign.

Rock Island County Republican chairman Tom Getz said the four committees listed in the FEC complaint — the Victory Fund, Rock Island County and Knox County Democratic Central committees, and Democratic Party of Illinois — "together have funneled literally hundreds of thousands of dollars in illegal soft money through at least four separate committees to pay for advertising urging Evans' re-election."

He added, "Lane Evans and the Rock Island County Democrat machine have shown complete disregard for playing by the rules when they think they can gain advantage by ignoring them."

The 17th District Victory Fund is funded primarily by labor unions, some individuals, and Democratic Party committees. A campaign contributions and expenditures report filed with the State Board of Elections in 1999 showed nearly \$250,000 was raised for 1998.

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Appendix 16

25044113759

DISBURSEMENT SCHEDULE H4
(Effective 1/1/91)JOINT FEDERAL/NON-FEDERAL
ACTIVITY SCHEDULE

PAGE 1	OF 2
FOR LINE 21a	

NAME OF COMMITTEE

17TH DISTRICT VICTORY FUND

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
STRATEGIC CONSULTING GROUP 4318 N ELSTON CHICAGO IL 60641	CONSULTING	4/10/00	5000. ⁰⁰	1500. ⁰⁰	3500. ⁰⁰
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 5000. ⁰⁰ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Corno Ind. 510 N Milwaukee CHICAGO IL 60622	Lunchroom Expense	5/25/00	222.91	66.87	156.04
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input checked="" type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 222.91 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
STRATEGIC CONSULTING GROUP 4318 N ELSTON CHICAGO IL 60641	CONSULTING	5/31/00	5000. ⁰⁰	1500. ⁰⁰	3500. ⁰⁰
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 10000. ⁰⁰ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Alscheuler & Associates 334 S Kenilworth Oak Park, IL 60302	CONSULTING	5/31/00	2000. ⁰⁰	600. ⁰⁰	1400. ⁰⁰
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 12000. ⁰⁰ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
STRATEGIC CONSULTING GROUP 4318 N ELSTON CHICAGO IL 60641	CONSULTING	6/20/00	10000. ⁰⁰	3000. ⁰⁰	7000. ⁰⁰
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 22000. ⁰⁰ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Compass Media Group 1415 N Dayton #311 CHICAGO IL 60622	Direct Mail Consultants	6/20/00	2000. ⁰⁰	600. ⁰⁰	1400. ⁰⁰
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: \$ 24000. ⁰⁰ <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			24222. ⁹¹	7266. ⁸⁷	16956. ⁰⁴
TOTAL THIS PERIOD (last page for each line only) (Fed. share to 21 a i and non-Fed. share to 21 a ii)					
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (last for line 21 of the detailed summary page)					

FD-800A

DISBURSEMENT SCHEDULE H4
(Effective 1/1/81)JOINT FEDERAL/NON-FEDERAL
ACTIVITY SCHEDULE

PAGE	OF
2	2
FOR LINE 21a	

NAME OF COMMITTEE

17th DISTRICT Victory Fund

A. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Aeschuler & Associates 394 S Kern Road Oak Park, IL 60302	Consulting	6/22/00	2500.00	750.00	1750.00
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: 1 26500.00 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
B. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Strategic Consulting Group 4318 N Elston Chicago, IL 60641	Consulting	6/22/00	2500.00	750.00	1750.00
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: 1 29000.00 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
C. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
James O. Watts 525 17th STREET Rock Island, IL 61201	Rent for office	6/30/00	750.00	225.00	525.00
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: 1 29750.00 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
D. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
Mio America Energy PO Box 8020 Davenport, IA 52808	deposit for utilities Heat & Lights	6/30/00	370.00	111.00	259.00
CATEGORY: <input checked="" type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: 1 30120.00 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
E. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
F. FULL NAME, MAILING ADDRESS & ZIP CODE	PURPOSE/EVENT	DATE	TOTAL AMOUNT	FEDERAL SHARE	NON-FEDERAL SHARE
CATEGORY: <input type="checkbox"/> ADMINISTRATIVE/VOTER DRIVE <input type="checkbox"/> FUNDRAISING <input type="checkbox"/> EXEMPT EVENT YEAR-TO-DATE: 1 <input type="checkbox"/> DIRECT CANDIDATE SUPPORT					
SUBTOTAL OF JOINT FEDERAL AND NON-FEDERAL ACTIVITY THIS PAGE			6120.00	1836.00	4284.00
TOTAL THIS PERIOD (last page for each line entry) (Fed. share to 21 a 1 and non-Fed. share to 21 a 1)			30342.91	9102.87	
TOTAL THIS PERIOD FOR THE NON-FEDERAL SHARE (used for line 31 of the detailed summary page)			21240.01		

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